

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PATRICIA COHEN,

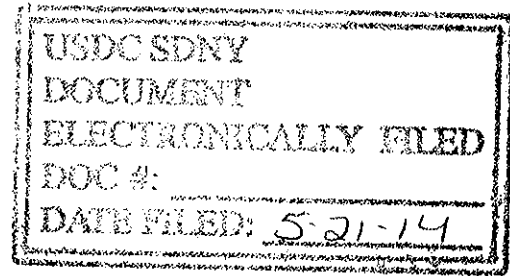
Plaintiff,

-v-

STEVEN A COHEN, et al.,

Defendants.

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09 CIV 10230 (LAP)

~~Proposed~~ **Scheduling Order**

The parties in the above-captioned action conferred by counsel on May 8, 2014.

Counsel for all parties participated in the conference and hereby jointly propose the following schedule:

1. The parties shall serve initial disclosures pursuant to Fed.R.Civ.P. Rule 26(a) by May 28, 2014.
2. The parties shall work together promptly to propose a protective order with respect to disclosures.
3. Fact discovery shall be completed by December 12, 2014.
4. Expert reports shall be served by January 12, 2015.
5. Rebuttal expert reports, if any, shall be served by February 12, 2015.
6. Expert depositions shall be completed by March 6, 2015.
7. Counsel for the parties have discussed the general subject matters about which discovery will be sought. The parties do not agree on the scope of discovery.

8. Any dispositive motions shall be filed by March 31, 2015. Papers in opposition thereto shall be filed by April 30, 2015, or one month after the dispositive motion is filed. Reply papers shall be filed by May 21, 2015, or three weeks after opposition papers are filed.
9. The parties shall file a joint pretrial order within thirty (30) days of a decision on any dispositive motion, if necessary. If no dispositive motions are filed, the parties shall file a joint pretrial order by May 7, 2015.
10. The parties agree that the service of discovery materials, motion papers, correspondence and all other papers may be made by electronic mail.
11. The parties do not currently anticipate a need to seek relief from the limitation on the number of depositions provided for in Rule 30, however, each reserves the right to do so.

May 8, 2014

Respectfully submitted,

GERALD B. LEFCOURT, P.C.

By: _____/s/_____
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May 20, 2014